



VICE PRESIDENT FOR FINANCE AND  
BUSINESS SERVICES

OXFORD, OHIO 45056  
(513) 529-4326

February 10, 2000

Chairman William E. Kennard  
Federal Communications Commission  
Room 8-B201  
445 Twelfth Street, S.W.  
Washington, DC 20554  
fax: (202) 418-2801

**RECEIVED**

FEB 11 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: WT Docket No. 97-207:  
Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Chairman Kennard:

As a member of the Association of Telecommunications Professionals in Higher Education (ACUTA), Miami University has closely followed the Calling Party Pays (CPP) rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Miami University to significant financial liability that would undermine our ongoing efforts to provide educational services.

Miami University currently has over 20,000 full- and part-time students and 4,000 full- and part-time employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail, for a variety of calls such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

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Chairman William E. Kennard  
Federal Communications Commission  
February 10, 2000  
Page 2

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers, but this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will not be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Miami University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is to assign one or more identifiable Service Access Codes (SAC) to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block or track CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely yours,



Richard M. Norman  
Vice President for Finance  
and Business Services

cc: Mr. Ari Fitzgerald, Legal Advisor to Chairman Kennard



MIAMI  
UNIVERSITY

VICE PRESIDENT FOR FINANCE AND  
BUSINESS SERVICES

OXFORD, OHIO 45056  
(513) 529-4226

February 10, 2000

Commissioner Michael K. Powell  
Federal Communications Commission  
Room 8-A204  
445 Twelfth Street, S.W.  
Washington, DC 20554  
fax: (202) 418-2820

Re: WT Docket No. 97-207:  
Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Commissioner Powell

As a member of the Association of Telecommunications Professionals in Higher Education (ACUTA), Miami University has closely followed the Calling Party Pays (CPP) rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Miami University to significant financial liability that would undermine our ongoing efforts to provide educational services.

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Commissioner Michael K. Powell  
Federal Communications Commission  
February 10, 2000  
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Sincerely yours,



Richard M. Norman  
Vice President for Finance  
and Business Services

cc: Peter A. Tenhula, Senior Legal Advisor to Commissioner Powell



MIAMI  
UNIVERSITY

VICE PRESIDENT FOR FINANCE AND  
BUSINESS SERVICES

OXFORD, OHIO 43056  
(614) 529-4330

February 10, 2000

Commissioner Gloria Tristani  
Federal Communications Commission  
Room 8-C302  
445 Twelfth Street, S.W.  
Washington, DC 20554  
fax: (202) 418-7542

Re: WT Docket No. 97-207:  
Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Commissioner Tristani:

As a member of the Association of Telecommunications Professionals in Higher Education (ACUTA), Miami University has closely followed the Calling Party Pays (CPP) rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Miami University to significant financial liability that would undermine our ongoing efforts to provide educational services.

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Commissioner Gloria Tristani  
Federal Communications Commission  
February 10, 2000  
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We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers, but this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will not be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "froc" calls can be made to CPP numbers, the cost of which will ultimately be borne by Miami University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

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Sincerely yours,



Richard M. Norman  
Vice President for Finance  
and Business Services

cc: Adam Krinsky, Legal Advisor to Commissioner Tristani



MIAMI  
UNIVERSITY

VICE PRESIDENT FOR FINANCE AND  
BUSINESS SERVICES

OXFORD, OHIO 43056  
(513) 520-1226

February 10, 2000

Commissioner Susan Ness  
Federal Communications Commission  
Room 8-B115  
445 Twelfth Street, S.W.  
Washington, DC 20554  
fax: (202) 418-2821

Re: WT Docket No. 97-207:  
Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Commissioner Ness:

As a member of the Association of Telecommunications Professionals in Higher Education (ACUTA), Miami University has closely followed the Calling Party Pays (CCP) rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Miami University to significant financial liability that would undermine our ongoing efforts to provide educational services.

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Commissioner Susan Ness  
Federal Communications Commission  
February 10, 2000  
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Sincerely yours,

A handwritten signature in black ink, appearing to read "Richard M. Norman", written over a horizontal line.

Richard M. Norman  
Vice President for Finance  
and Business Services

cc: Mr. Mark Schneider, Senior Legal Advisor to Commissioner Ness





VICE PRESIDENT FOR FINANCE AND  
BUSINESS SERVICES

OXFORD, OHIO 43056  
(614) 529-4326

February 10, 2000

Commissioner Harold W. Furchtgott-Roth  
Federal Communications Commission  
Room 8-A302  
445 Twelfth Street, S.W.  
Washington, DC 20554  
fax: (202) 418-2802

Re: WT Docket No. 97-207:  
Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Commissioner Furchtgott-Roth

As a member of the Association of Telecommunications Professionals in Higher Education (ACUTA), Miami University has closely followed the Calling Party Pays (CPP) rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Miami University to significant financial liability that would undermine our ongoing efforts to provide educational services.

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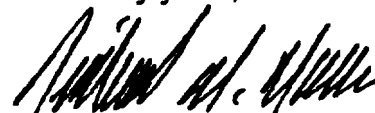
Commissioner Harold W. Furchtgott-Roth  
Federal Communications Commission  
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Sincerely yours,



Richard M. Norman  
Vice President for Finance  
and Business Services

cc: Bryan Trainont, Legal Advisor to Chairman Furchtgott-Roth



MIAMI  
UNIVERSITY

VICE PRESIDENT FOR FINANCE AND  
BUSINESS SERVICES

OXFORD, OHIO 45056  
(513) 529-4226

February 10, 2000

Mr. James D. Schlichting  
Deputy Bureau Chief,  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-C254  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: WT Docket No. 97-207:  
Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Schlichting:

As a member of the Association of Telecommunications Professionals in Higher Education (ACUTA), Miami University has closely followed the Calling Party Pays (CPP) rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Miami University to significant financial liability that would undermine our ongoing efforts to provide educational services.

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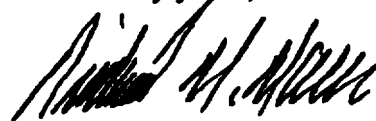
Mr. James D. Schlichting  
Federal Communications Commission  
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Sincerely yours,

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Richard M. Norman  
Vice President for Finance  
and Business Services



MIAMI  
UNIVERSITY

VICE PRESIDENT FOR FINANCE AND  
BUSINESS SERVICES

Oxford, Ohio 45056  
(614) 529-4230

February 10, 2000

Mr. Thomas Sugrue  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-C252  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: WT Docket No. 97-207:  
Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Mr. Thomas Sugrue:

As a member of the Association of Telecommunications Professionals in Higher Education (ACUTA), Miami University has closely followed the Calling Party Pays (CCP) rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Miami University to significant financial liability that would undermine our ongoing efforts to provide educational services.

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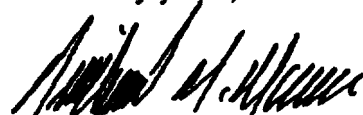
Mr. Thomas Sugrue  
Federal Communications Commission  
February 10, 2000  
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Richard M. Norman  
Vice President for Finance  
and Business Services



MIAMI  
UNIVERSITY

VICE PRESIDENT FOR FINANCE AND  
BUSINESS SERVICES

Oxford, Ohio 45056  
(513) 549-4226

February 10, 2000

Mr. Joe Levin  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-B135  
445 Twelfth Street, S.W.  
Washington, DC 20554  
fax: (202) 418-7247

Re: WT Docket No. 97-207:  
Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Levin:

As a member of the Association of Telecommunications Professionals in Higher Education (ACUTA), Miami University has closely followed the Calling Party Pays (CPP) rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Miami University to significant financial liability that would undermine our ongoing efforts to provide educational services.

Miami University currently has over 20,000 full- and part-time students and 4,000 full- and part-time employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail, for a variety of calls such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

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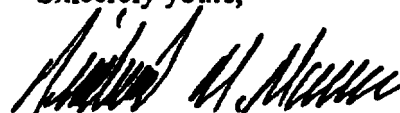
Mr. Joe Levin  
Federal Communications Commission  
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We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers, but this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will not be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Miami University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is to assign one or more identifiable Service Access Codes (SAC) to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block or track CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely yours,



Richard M. Norman  
Vice President for Finance  
and Business Services





**MIAMI  
UNIVERSITY**

**VICE PRESIDENT FOR FINANCE AND  
BUSINESS SERVICES**

Oxford, Ohio 43050  
(513) 529-4226

**February 10, 2000**

**Mr. David Siehl  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-A164  
445 Twelfth Street, S.W.  
Washington, DC 20554  
fax: (202) 418-7247**

**Re: WT Docket No. 97-207:  
Calling Party Pays Service Offering in the Commercial Mobile Radio Services**

**Dear Mr. Siehl:**

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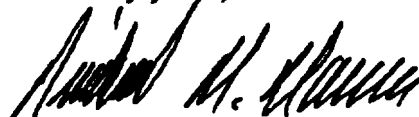
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Oxford, Ohio 45056  
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**February 10, 2000**

**Ms. Kris Montcith  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 3-C122  
445 Twelfth Street, S.W.  
Washington, DC 20554  
fax: (202) 418-7247**

**Re: WT Docket No. 97-207:  
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**Dear Ms. Monteith:**

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Ms. Kris Montcith  
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